

REMARKS

Claims 1-3, 5-20, and 22-34 are presently pending. Claims 4 and 21 are cancelled without prejudice.

Claims 1-34 were rejected under 35 U.S.C. § 112, second paragraph. Assignee has amended the claims and respectfully submits that this rejection is overcome.

Claims 1-34 were rejected under 35 U.S.C. § 102(e) as being anticipated by Greaves. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). >"When a claim covers several structures or compositions, either generically or as alternatives, the claim is deemed anticipated if any of the structures or compositions within the scope of the claim is known in the prior art." *Brown v. 3M*, 265 F.3d 1349, 1351, 60 USPQ2d 1375, 1376 (Fed. Cir. 2001) (claim to a system for setting a computer clock to an offset time to address the Year 2000 (Y2K) problem, applicable to records with year date data in "at least one of two-digit, three-digit, or four-digit" representations, was held anticipated by a system that offsets year dates in only two-digit formats). See also MPEP § 2131.02.< "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). See also MPEP § 2131.02.

Assignee has amended claim 1 to recite, among other limitations,

if the hardware structure design language file comprises a task library:

identifying a hardware structure design language task within the task library;

and translating the hardware structure design language task into a general purpose programming language function; and

if the hardware structure design language file comprises a main driver:

inserting in the hardware structure design language file at least one general purpose programming language interface header.

Examiner has indicated (in rejecting claim 4) that Greaves teaches "[0023], tasks, driver module [0028], library of standard tasks and functions written in an object oriented programming language ...substitute ... for the task or function".

Assignee respectfully submits that Greaves does not teach the foregoing limitation. In particular, Greaves [0023] and [0028] do not describe making a determination "if the hardware structure design language file comprises a task library" or making a determination whether "if the hardware structure design language file comprises a main driver". Accordingly, Examiner is respectfully requested to withdraw the rejection to claims 1 and 18, as well as to dependent claims 2, 3, 5-17, 19, 20, and 22-34.

Additionally, claims 5 recites, "wherein the hardware structure design language comprises # delay statements". Claim 6 recites "wherein the hardware structure design language comprises "ifdef statements". Claim 7 recites "wherein the hardware structure design language comprises ' symbols from the hardware design structural language."

Examiner has indicated that in Greaves [0019], "Expressions (# delay) are directly converted to the target alternative programming language"; "Expressions ('ifdef) are directly converted to the target alternative programming language"; and "Expressions (special symbols) are directly converted to the target alternative programming language".

However, it is respectfully submitted that paragraph 0019 does not even mention "# delay statements", "ifdef statements", and '. As noted above, for anticipation, the "identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). MPEP § 2131.02.

Accordingly, Examiner is respectfully requested to withdraw the rejection to claims 5-7 under 35 U.S.C. § 102(e) as well as claims 22, 23, and 24.

For at least the foregoing reasons, Assignee respectfully submits that each of the pending claims are in a condition for allowance and Examiner is respectfully requested to pass this case to issuance.

CONCLUSION

For at least the foregoing reasons, Assignee submits that each of the pending claims are allowable, thereby placing this application in a condition for allowance. Examiner is respectfully requested to pass this case to issuance.

The Commissioner is hereby authorized to charge any deficiency in the amount enclosed or any additional fees which may be required under 37 CFR 1.16 or 1.17 to Deposit

Account No. 13-0017 in the name of McAndrews, Held & Malloy,
Ltd.

RESPECTFULLY SUBMITTED,



Mirut Dalal
Attorney for Assignee
Reg. No. 44,052

McANDREWS, HELD & MALLOY, LTD.
500 W. Madison - 34th Floor
Chicago, IL 60661
Phone: (312) 775-8000
FAX: (312) 775-8100